CONNELL FOLEY LLP 85 Livingston Avenue Roseland, New Jersey 07068 (973) 535-0500 Attorneys for Susan M. Buttitta John S. Barnett, Esq. (JB6852) Stephen V. Falanga, Esq. (SF6414) Ryan A. McGonigle, Esq. (RM8234) Hearing Date: January 5, 2006 @ 10:00 a.m. Objection Deadline: December 29, 2005

UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:

DELPHI CORPORATION, et al.,

Debtors.

Chapter 11

Bankr. Case No. 05-44481 (RDD)

(Jointly Administered)

NOTICE OF MOTION FOR ENTRY OF ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. 362 TO CONTINUE CERTAIN PERSONAL INJURY STATE COURT ACTION AGAINST THE DEBTOR

TO: ALL PARTIES ON ATTACHED SERVICE LIST

Dear Sir or Madam:

PLEASE TAKE NOTICE that on January 5, 2006 at 10:00 a.m., pursuant to 11 U.S.C. §362(d), Susan M. Buttitta ("Buttitta") shall move before the Honorable Robert D. Drain, U.S.B.J., at the United States Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, for the entry of an Order granting Buttitta relief from the provisions of the automatic stay to permit Buttitta to continue a certain personal injury state court action against the debtor in the above-

05-44481-rdd Doc 1307 Filed 11/28/05 Entered 11/28/05 17:18:54 Main Document Pq 2 of 2

captioned Chapter 11 proceeding, Delphi Corporation ("Debtor" or "Delphi").

PLEASE TAKE FURTHER NOTICE that Buttitta shall rely upon her

Memorandum of Law in support of said Notice, Certification of Counsel with Exhibits,

and the proposed form of Order submitted herewith, and any papers submitted hereafter.

PLEASE TAKE FURTHER NOTICE that responses and objections, if any, to

the Motion shall be in writing, shall state with particularity the reasons for the objection

or response, and shall be filed with the Court, with a courtesy copy delivered to the

Chambers of the Honorable Robert D. Drain, U.S.B.J., and served upon counsel for

moyant, Connell Foley LLP, 85 Livingston Avenue, Roseland, New Jersey 07068, attn:

John S. Barnett, so as to be filed and received on or before by December 29, 2005. Only

those objections which have been timely filed and served may be considered by the Court

at the hearing.

PLEASE TAKE FURTHER NOTICE that if you fail to respond in accordance

with this Notice, the Court may grant the relief demanded by Motion without further

notice or hearing.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

CONNELL FOLEY LLP

Attorneys for Susan M. Buttitta

DATED: November 28, 2005

By: /s/ Stephen V. Falanga

Stephen V. Falanga, Esq. (SF6414)

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